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8 Attorneys for Defendant,  
Professional Collection Consultants

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10 IN THE UNITED STATES DISTRICT COURT  
11 FOR THE CENTRAL DISTRICT OF CALIFORNIA - WESTERN DIVISION  
12

13 WESTERN WORLD INSURANCE  
COMPANY,

14 Plaintiff,

15 v.

16 PROFESSIONAL COLLECTION  
17 CONSULTANTS,

18 Defendant.

Case No. 2:15-cv-02342 MWF (VBKx)

**DECLARATION OF JAHNAVI  
GOLDSTEIN IN OPPOSITION TO  
WESTERN WORLD INSURANCE  
COMPANY'S MOTION FOR  
PARTIAL SUMMARY JUDGMENT  
RE: QUANTIFICATION OF  
DAMAGES**

Date: July 2, 2018

Time: 10:00 a.m.

Ctrm: 5A

Judge: Hon. Michael W. Fitzgerald

Complaint Filed: March 30, 2015

**DECLARATION OF JAHNAVI GOLDSTEIN**

I, Jahnavi Goldstein, declare as follows:

1. I am an attorney licensed to practice before all courts in the State of California, the United States District Courts for the Central and Southern Districts of California, the Ninth Circuit Court of Appeals, and before all courts in the State of Tennessee. I am a Senior Associate Attorney at the Law Office of David W. Wiechert, counsel for Defendant Professional Collection Consultants (“PCC”). The following is based on my personal knowledge and if called as a witness, I could and would testify competently thereto.

2. On December 19, 2017 David W. Wiechert provided the PCC fine check in the amount of \$350,000 to the Clerk of Court at the Los Angeles Federal District Courthouse.

3. As counsel for PCC in the criminal federal matter, our firm can confirm that PCC’s former President, Todd Shields, was not prosecuted in the federal case United States of America v. Professional Collection Consultants, et. al, Case No. 17-cr-00732-SJO, and there is no expectation that he will be.

4. I spent 7.4 hours extensively reviewing the Western World backup (or lack thereof) and live spreadsheets, identifying missing backup, and communicating with Western World’s counsel re the missing documentation and inaccurate damage figures.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed, in Nashville, Tennessee on June 11, 2018.

S/Jahnavi Goldstein

JAHNAVI GOLDSTEIN